

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIA FLORES,

Plaintiff,

-vs-

EMPIRE CLEANERS INC. and DAE HOON HA,

Defendants.

08 CIV. 2039 (JGK)

**DEFENDANTS' RULE 26(a)(1)
DISCLOSURES**

ECF CASE

Defendants **EMPIRE CLEANERS INC.** and **DAE HOON HA**, by their attorney, **THE
LAW OFFICE OF JONATHAN Y. SUE**, submit the following:

(1) Initial Disclosures.

(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information;

Dae Hoon Ha
452 2nd Avenue
New York, New York 10010
212.532.2751

The above named individual has personal knowledge as to plaintiff's employment activities and wages.

(B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings;

Plaintiff's payroll records will be forwarded when located.

(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

Defendants' costs and reasonable attorneys' fees.

(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgement.

None.

Dated: New York, New York
June 25, 2008

LAW OFFICE OF JONATHAN Y. SUE

/s/ Jonathan Sue

By: Jonathan Y. Sue (JS / 0738)
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